

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

RONALD KOONS, *et al.*,

Plaintiffs,

v.

WILLIAM REYNOLDS, *et al.*,

Defendants.

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No. 1:22-cv-07464-RMB-EAP

**ORDER TO SHOW CAUSE FOR  
A TEMPORARY RESTRAINING  
ORDER AND PRELIMINARY  
INJUNCTION**

**ORAL ARGUMENT REQUESTED**

**THIS MATTER** having been brought before the Court by Plaintiffs, through their counsel, by Order to Show Cause seeking a temporary restraining order and preliminary injunction pursuant to Federal Rule of Civil Procedure 65 and L.Civ. R. 65.1, and upon the Amended Complaint, Declarations, and Memorandum of Law submitted herewith, the Court having determined that good and sufficient reasons exist to proceed by way of Order to Show Cause, and for good cause shown,

**IT IS** on this \_\_\_\_\_ day of \_\_\_\_\_, 2022, **ORDERED** that the Defendants appear and show cause on the \_\_\_\_\_ day of \_\_\_\_\_, 2022, before the United States District Court for the District of New Jersey, Hon. Renée Marie Bumb, at the Camden Courthouse, located at 4th & Cooper Streets, Courtroom 3D, Camden, New Jersey 08101, at \_\_\_\_\_ o'clock in the \_\_\_\_\_ noon, or as soon thereafter as counsel can be heard, why an Order should not be entered:

1. enjoining and restraining Defendants, and their officers, agents, servants, employees, and all persons in concert or participation with them who receive notice of the injunction, from enforcing subparts 12, 15, 17 and 24 of section 7(a) and subpart 1 of section 7(b) of the legislation recently enacted as A4769/S3214; and

2. iii. such other and further relief, including injunctive relief, against all Defendants, as may be necessary to effectuate the Court's judgment, or as the Court otherwise deems just and equitable;

And it is further **ORDERED** that:

1. Pending further hearing on this Order to Show Cause, Defendants, and their officers, agents, servants, employees, and all persons in concert or participation with them who receive notice of the injunction, are temporarily enjoined and restrained from enforcement of subparts 12, 15, 17 and 24 of section 7(a) and subpart 1 of section 7(b) of the legislation recently enacted as A4769/S3214; and

2. A copy of this Order to Show Cause, Memorandum of Law, supporting Declarations, as well as the Complaint, together with a summons, shall be served upon the Defendants within \_\_\_\_\_ days of the date hereof.

3. Defendants shall file and serve written response(s) to this Order to Show Cause and the supporting Memorandum of Law by the \_\_\_\_ day of \_\_\_\_\_, 2022.

4. The Plaintiff may file and serve any written reply to one or both Defendants' opposition by the \_\_\_\_ day of \_\_\_\_\_, 2022.

5. If the Defendants do not file and serve opposition to this Order to Show Cause, the application will be decided on the papers on the return date and relief may be granted by default.

6. If the Plaintiff has not already done so, a proposed form of Order addressing the relief sought on the return date must be submitted to the Court no later than three (3) days before the return date.

7. The Court will notify the parties whether it will entertain argument on the return date of the Order to Show Cause in accordance with Local Civil Rule 78.1.

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Hon. Renée Marie Bumb  
United States District Court Judge